



Central Utah Water Conservancy District

355 WEST 1300 SOUTH OREM, UTAH 84058-7303
TELEPHONE (801) 226-7100

Don A. Christiansen, General Manager
Secretary/Treasurer

RECEIVED

November 29, 1993 ~~1993~~ DEC 01 1993

WATER RIGHTS
SALT LAKE

OFFICERS

Gary D. Palmer, President
Rondal McKee, Vice President

BOARD OF DIRECTORS

Leo L. Brady
Brent Brotherson
J. Merrill Bushnell
Pete A. Coleman
Evans Tim Doxey
R. Roscoe Garrett
Harley M. Gillman
Thomas V. Hatch
Claude Hicken
Gerald K. Maloney
Rondal McKee
Patricia A. O'Rourke
Gary D. Palmer
Kent R. Peatross
David Rasmussen
Howard Riley
W. Roger Walker
Robert F. Weyher, Jr.
Boyd Workman

Mr. Robert L. Morgan
State Engineer
Utah Department of Natural Resources
Division of Water Rights
1636 West North Temple
Salt Lake City, UT 84116

Dear Bob:

The District appreciated the opportunity to attend and participate in your Utah Lake Distribution Plan (Distribution Plan) meeting held on October 28, 1993. The District has spent considerable time developing an understanding of the Distribution Plan and analyzing its effect on the District's present and future operations. We feel that it is a reasonable approach to solving many of the problems that need to be taken into account and resolved on the Provo River as it relates to Utah Lake. In this regard, the District has the following comments relating to the concepts that were presented by your staff during the meeting held on October 28, 1993, and the Distribution Plan in general.

1. Reporting on Transbasin Imports, Reservoir Releases, and Return Flow Credits. The District supports the need expressed by your staff to immediately report to the river commissioner when water imports, releases, and or spills are made and under what rights and destinations are involved. The District also supports the requirement of claiming any return flow credits and the water rights involved by November 1 of each year. The District believes this will help all parties involved more effectively plan their operations for the coming year.
2. Modifications to the System Storage Conversion Curve. The District will give you notification by April 1 of each year of whether or not it plans to leave its Utah Lake water in Utah Lake and/or request a modification of the system storage conversion and primary storage curves.
3. Evaporation Losses on Import Water Held in Utah Lake. The District strongly believes that calculated evaporation losses on import water should be based on the incremental method described by your staff during the October 28, 1993,

meeting. This evaporation calculation approach is reasonable since the Distribution Plan's conversion and primary storage curves already take into account the heavy evaporation losses in Utah Lake suffered by the non-import water. Import water in Utah Lake that has not yet been used for upstream conversion by exchange should only be charged evaporation losses based on the incremental increase in surface area caused by the presence of import water. Using a prorated approach to import water evaporation will whittle away at the import water faster than actually occurs. This will in effect benefit the Utah Lake rights just by having import water in Utah Lake to the detriment of water right Exchange #398. As you may know, District staff has previously met with your staff concerning this matter and would be happy to meet again at your convenience to discuss the matter further.

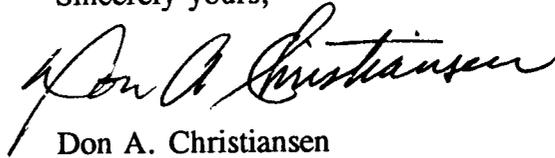
4. Transportation Losses on the Provo River. The District has a great concern with the four percent loss described by your staff that would be charged to all water stored above Heber City. All parties acknowledge that the four percent loss is an arbitrary figure imposed by a River Commissioner many years ago and simply perpetuated by each subsequent Commissioner. The District understands this to mean that any releases of CUP project water from Jordanelle Reservoir to its petitioners in Wasatch, Utah, and Salt Lake Counties or instream flow releases from Jordanelle to Deer Creek reservoirs would suffer the four percent loss. We request that the described four percent loss charged to storage water released from Jordanelle Reservoir not be implemented until the State Engineer further evaluates pertinent data now available as well as the data forthcoming from the District relating to its Central Utah Project Completion Act studies on the Provo River system. The premature implementation of a four percent actual loss before it is known what the loss may be is one more item that is eating away at the much needed water supply available for the Central Utah Water Conservancy District's instream flow and petitioner interests.
5. Calls by Utah Lake for System Storage Releases. This item was not discussed at the October 28, 1993, meeting; however, the District is very concerned with the Distribution Plan concept that requires any system storage that is stored above Utah Lake to be released in full when Utah Lake drops sufficiently below primary storage to call on all system storage held upstream. In other words, if 1,000 acre-feet is stored as system storage in Jordanelle Reservoir and over several months 50 acre-feet is evaporated away in Jordanelle Reservoir, it is the District's understanding that the State Engineer could call on 1,000 acre-feet to be released instead of 950 acre-feet. It is the District's position that this approach is unreasonable. If the system storage had never been held upstream more than the 50 acre-feet would have been evaporated

Mr. Robert L. Morgan
November 29, 1993
Page 3

and less than 950 acre-feet would be in Utah Lake. Only the amount of system storage remaining after evaporation should be called for to be released to Utah Lake when needed.

The District would welcome an opportunity to meet with your staff once again to discuss its concerns and comments in detail, if you so desire. We appreciate your staff's work and the many hours that they have spent with the District in providing input and help in the planned operations of the Bonneville Unit of the Central Utah Project. If you have any questions, please call this office.

Sincerely yours,



Don A. Christiansen
General Manager

DAC/RLT:dv

cc: Steve Clyde
USBR - Provo
Provo River Water Users Association